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May 31, 2024

Via ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Garcia Luna* 19 Cr. 576 (BMC)

Dear Judge Cogan,

We write, with the consent of the government, to respectfully request that Mr. Garcia Luna's sentencing be adjourned to a date during either the week beginning September 16, 2024, or the week beginning September 23, 2024.

Mr. Garcia Luna's sentencing is currently scheduled for June 24, 2024. The requested adjournment is necessary for three reasons. First, Mr. Garcia Luna's post-trial motion seeking a new trial pursuant to Rule 33 is currently pending before the Court. Second, the final presentence report has yet to be disclosed and when it is, we will need the appropriate time to review the final report with him and prepare our sentencing submission. And third, Mr. Garcia Luna's counsel are currently unable to devote the time necessary to adequately prepare for his sentencing prior to the requested dates. I am currently on trial in the Southern District of New York in *United States v. Menendez, et al.*, 23 Cr. 490 (SHS), and will be for at least several more weeks and perhaps into July 2024. As noted above, in light of these commitments, the government consents to an adjournment through the requested dates.

Accordingly, we respectfully request that Mr. Garcia Luna's sentencing in the above-captioned matter be adjourned to a date during either the week beginning September 16, 2024, or the week beginning September 23, 2024.

Respectfully submitted,

/s/

César de Castro
Valerie Gotlib
Shannon McManus
Florian Miedel

Cc: all counsel of record (via ECF)